

EXHIBIT E

Proposed Deposition Topics (August 9, 2007)	ViewSonic Deposition Topics (January 30, 2007)	Tatung Deposition Topics (December 12, 2006)
1(a) The identity of any Prior Art LPL Product.	Topics: 1(a) 8(c)(d)(e); 21(a)(b); 23(a)(e); 28	Topics: 1(a); 8(c)(d)(e); 21(a)(b); 23(a)(e); 28
1(b) Any use in any Prior Art LPL Product of any inventions(s) disclosed in the Asserted Patents or any Counterpart thereof.	Topics: 1(a); 8(c)(d)(e); 20(a); 21(a)(b); 28	Topics: 1(a); 8(c)(d)(e); 20(a); 21(a)(b); 28
1(c) All methods and structures relating to a Prior Art LPL Product;	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28
1(d) The structure, assembly, operation, and functionality of any Prior Art LPL Product and each component thereof.	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28
1(e) The research, design, development and/or engineering of any Prior Art LPL Product and each component thereof.	Topics: 8(c)(d)(e); 10(a)(b)(c); 20(a)(b)(c); 23(a)(b)(c)(e)	Topics: 8(c)(d)(e); 10(a)(b)(c); 20(a)(b)(c); 23(a)(b)(c)(d)(e)
1(f) The performance and/or function associated with each design of any manner and/or method to affix, attach and/or secure a Prior Art LPL Product within, on or to another structure of any type including, without limitation, a Flat Panel Display Product.	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28
1(g) The location and structure of any fastening parts or elements, including but not limited to holes, through holes or threaded holes or holes used as part of a fastening or locking mechanism, located on any surface of a Prior Art LPL Product.	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28
1(h) The location and structure of any fastening parts or elements, including but not limited to holes, through holes or threaded holes or holes used as part of a fastening or	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28

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locking mechanism, located on or viewable from the back or rear of a Prior Art LPL Product or located on or viewable from the back or rear of a backlight unit or assembly used in a Prior Art LPL Product.		
1(i) The development and/or first use, first offer to sell, and/or first sale of each Prior Art LPL Product.	Topics: 10(a)(b)(c); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e)	Topics: 10(a)(b)(c); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e)
2(a) The identity of any Other LPL Product.	Topics: 1(a); 8(c)(d)(e); 21(a)(b); 23(a)(e); 28	Topics: 1(a); 8(c)(d)(e); 21(a)(b); 23(a)(e); 28
2(b) Any use in any Other LPL Product of any inventions(s) disclosed in the Asserted Patents or any Counterpart thereof;	Topics: 1(a); 8(c)(d)(e); 20(a); 21(a)(b); 28	Topics: 1(a); 8(c)(d)(e); 20(a); 21(a)(b); 28
2(c) All methods and structures relating to any Other LPL Product;	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28
2(d) The structure, assembly, operation, and functionality of any Other LPL Product and each component thereof.	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28
2(e) The research, design, development and/or engineering of any Other LPL Product and each component thereof.	Topics: 8(c)(d)(e); 10(a)(b)(c); 20(a)(b)(c); 23(a)(b)(c)(e)	Topics: 8(c)(d)(e); 10(a)(b)(c); 20(a)(b)(c); 23(a)(b)(c)(d)(e)
2(f) The performance and/or function associated with each design of any manner and/or method to affix, attach and/or secure an Other LPL Product within, on or to another structure of any type including, without limitation, a Flat Panel Display Product.	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28
2(g) The location and structure of any fastening parts or elements, including but not limited to holes, through holes	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28

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or threaded holes or holes used as part of a fastening or locking mechanism, located on any surface of an Other LPL Product.		
2(h) The location and structure of any fastening parts or elements, including but not limited to holes, through holes or threaded holes or holes used as part of a fastening or locking mechanism, located on or viewable from the back or rear of an Other LPL Product or located on or viewable from the back or rear of a backlight unit or assembly used in an Other LPL Product.	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e); 28	Topics: 1(a); 8(c)(d)(e); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e); 28
2(i) The development and/or first use, first offer to sell, and/or first sale of each Other LPL Product.	Topics: 10(a)(b)(c); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(e)	Topics: 10(a)(b)(c); 20(a)(b)(c); 21(a)(b); 23(a)(b)(c)(d)(e)
3(a) The incorporation, inclusion, or mounting of any Prior Art LPL Product into any other Flat Panel Display Product.	Topics: 1(a); 8(c)(d)(e); 20(a); 21(a)(b); 28	Topics: 1(a); 8(c)(d)(e); 20(a); 21(a)(b); 28
3(b) All customers, distributors, suppliers, and resellers to whom Prior Art LPL Products have been marketed, shipped, imported, transferred, sold, and/or distributed.	Topics: 13(b)(c)(d)(e)(f)(w); 15(b)(c)	Topics: 13(b)(c)(d)(e)(f)(w); 15(b)(c)
3(c) The identity of any and all Flat Panel Display Products marketed, shipped, imported, transferred, sold, and/or distributed in the United States containing a Prior Art LPL Product, including without limitation the identity of the manufacturer, brand name, model number, and product	Topics: 1(a); 8(c)(d)(e); 21(a)(b); 23(a)(e); 28	Topics: 1(a); 8(c)(d)(e); 21(a)(b); 23(a)(e); 28

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description.		
3(d) All distributors, suppliers, channels, and networks through which you have, directly by you, for you or on your behalf, marketed, shipped, imported, transferred, sold, and/or distributed Prior Art LPL Products, the relationship between or among you and all such entities, the identity of all such entities, any contracts, agreements, or contractual business arrangements between you and such entities, and the quantity and value of such products;	Topics: 13(b)(c)(d)(e)(f)(w); 15(b)(c)	Topics: 13(b)(c)(d)(e)(f)(w); 15(b)(c)
3(e) All meetings, communications, agreements, and contractual and business relationships, that relate to the importation, manufacture, distribution, promotion, marketing, advertising, purchases, or sales in the United States of any Prior Art LPL Products and/or Flat Panel Display Products containing Prior Art LPL Products, including but not limited to those products which use, are arranged to use, employ and/or embody any Prior Art LPL Product.	Topics: 13(b)(c)(d)(e)(f)(w); 14(a)(b)(c)(d)(e)(f); 15(b)(c)	Topics: 13(b)(c)(d)(e)(f)(w); 14(a)(b)(c)(d)(e)(f); 15(b)(c)
4(a) The incorporation, inclusion, or mounting of any Other LPL Product into any other Flat Panel Display Product.	Topics: 1(a); 8(c)(d)(e); 20(a); 21(a)(b); 28	Topics: 1(a); 8(c)(d)(e); 20(a); 21(a)(b); 28
4(b) All customers, distributors, suppliers, and resellers to whom Other LPL Products have been marketed,	Topics: 13(b)(c)(d)(e)(f)(w); 15(b)(c)	Topics: 13(b)(c)(d)(e)(f)(w); 15(b)(c)

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shipped, imported, transferred, sold, and/or distributed.		
4(c) The identity of any and all Flat Panel Display Products marketed, shipped, imported, transferred, sold, and/or distributed in the United States containing an Other LPL Product, including without limitation the identity of the manufacturer, brand name, model number, and product description.	Topics: 1(a); 8(c)(d)(e); 21(a)(b); 23(a)(e); 28	Topics: 1(a); 8(c)(d)(e); 21(a)(b); 23(a)(e); 28
4(d) All distributors, suppliers, channels, and networks through which you have, directly by you, for you or on your behalf, marketed, shipped, imported, transferred, sold, and/or distributed Other LPL Products, the relationship between or among you and all such entities, the identity of all such entities, any contracts, agreements, or contractual business arrangements between you and such entities, and the quantity and value of such products;	Topics: 13(b)(c)(d)(e)(f)(w); 15(b)(c)	Topics: 13(b)(c)(d)(e)(f)(w); 15(b)(c)
4(e) All meetings, communications, agreements, and contractual and business relationships, that relate to the importation, manufacture, distribution, promotion, marketing, advertising, purchases, or sales in the United States of any Other LPL Products and/or Flat Panel Display Products containing Other LPL Products, including but not limited to those products which use, are arranged to use,	Topics: 13(b)(c)(d)(e)(f)(w); 14(a)(b)(c)(d)(e)(f); 15(b)(c)	Topics: 13(b)(c)(d)(e)(f)(w); 14(a)(b)(c)(d)(e)(f); 15(b)(c)

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employ and/or embody any Other LPL Product.		
5(a) Any damages sustained by LPL as a result of the infringement of the Asserted Patents and/or any Counterpart thereof and/or any patent you own or license regarding Mounting Technology by any entity, including any contentions, positions, or assertions of price erosion, lost profits, reasonable royalty, established royalty and/or lost sales, and/or any other basis for compensation under 35 U.S.C. § 284;	Topics: 13(a)	Topics: 13(a)
5(b) All actions you have taken to sell, distribute, market, promote, advertise the inventions disclosed and/or claimed in the Asserted Patents or any Counterpart thereof, including the promotional, marketing, sales and advertising activities with respect to any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;	Topics: 13(b)	Topics: 13(b)
5(c) All actions you have taken to sell, distribute, market, promote, advertise the inventions disclosed and/or claimed in any patent you hold, claim to hold and/or license which relates to Mounting Technology, including the promotional, marketing, sales and advertising activities with respect to any LPL Product	Topics: 13(c)	Topics: 13(c)

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and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;		
5(d) All efforts you have made to promote, market, and/or advertise LPL Products;	Topics: 13(d)	Topics: 13(d)
5(e) The relevant market(s) for any LPL Product and/or any Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;	Topics: 13(e)	Topics: 13(e)
5(f) The monthly, quarterly, and annual unit volume and dollar revenue, by customer, of each LPL Product and/or Flat Panel Display Product which uses, is arranged to use, capable of employing and/or embodies any LPL Product, that was made, used, sold, offered for sale, or otherwise transferred: (i) in the United States and/or (ii) outside the United States;	Topics: 13(f)	Topics: 13(f)
5(g) All costs associated with manufacturing, selling or otherwise transferring any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product. This topic includes without limitation the unit costs of all such LPL Product and/or Flat Panel Display Products and/or the cost(s), actual, projected or estimated, associated with each design of any manner and/or method to attach, secure and/or assemble the LPL Product within, on or to	Topics: 13(g)	Topics: 13(g)

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another structure including without limitation a Flat Panel Display Product;		
5(h) For each year from the first commercialization by LPL, the monthly, quarterly and/or annual gross revenues, gross profits, gross profit margins, net profits and net profit margins on sales of each LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;	Topics: 13(h)	Topics: 13(h)
5(i) The actual, projected, or desired return on investment, and all analyses related to, associated with the manufacture and/or sale of any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;	Topics: 13(i)	Topics: 13(i)
5(j) The percentage of LPL's total sales volume of LPL Products and/or Flat Panel Display Products using, arranged to use, capable of employing and/or embodying any LPL Product (i) sold inside the United States; and (ii) sold outside the United States;	Topics: 13(j)	Topics: 13(j)
5(k) LPL's royalty payments and future obligations, if any, to or from any third party with respect to any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;	Topics: 13(k)	Topics: 13(k)
5(l) LPL's cost of goods for	Topics: 13(l)	Topics: 13(l)

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any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;		
5(m) LPL's actual or projected costs of research, development and testing of any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product.	Topics: 13(m)	Topics: 13(m)
5(n) LPL's cost of developing the capacity to manufacture any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;	Topics: 13(n)	Topics: 13(n)
5(o) All forecasts, projections or expectations, since January 1, 1996, regarding sales and/or profitability for any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;	Topics: 13(p)	Topics: 13(p)
5(p) LPL's pricing of and price changes for any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product;	Topics: 13(q)	Topics: 13(q)
5(q) The nature, timing, extent, cost or business rationale for any promotional practices engaged in by LPL for any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or	Topics: 13(r)	Topics: 13(r)

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embodying any LPL Product;		
5(r) Actual or potential customers for any LPL Product and/or Flat Panel Display Product using, arranged to use, capable of employing and/or embodying any LPL Product.	Topics: 13(w)	Topics: 13(w)
6 Any “commercial success” of the subject matter and/or inventions disclosed and/or claimed in each of the Asserted Patents and/or any Counterpart thereof by such subject matter and/or inventions including without limitation, the availability of any LPL Product.	Topics: 22(b)	Topics: 22(b)
7(a) LPL’s document, data, product and/or record retention policies and procedures and/or the adherence or suspension of such policies in connection with this litigation, including without limitation LPL’s document management policy referred to on page 3 of the August 3, 2007 letter from Richard Kirk to the Honorable Vincent J. Poppiti and any policies and procedures relating to the retention of LPL products.	Topics: 19(a)	Topics: 19(a)
7(b) The storage of, access to and searchability and/or retrieval of electronic information including any and all electronic mail or messaging systems used by LPL.	Topics: 19(b)	Topics: 19(b)
7(c) The storage of, access to and searchability and/or retrieval of technical	Topics: 19(b)	Topics: 19(b)

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information, including but not limited to drawings, product specifications, service manuals, assembly or work instructions, including without limitation those produced by LPL at LPL 18927 - LPL 20752 and LPL 20900 - LPL 21540, and any replacements for such documents or supplements to such documents.		
7(d) LPL's possession, retention, storage, or archiving of any LPL Product.	Topics: 19(a)(b)	Topics: 19(a)(b)
7(e) All specifications, drawings, manuals, instructions, or procedures relating to any Prior Art LPL Product.	Topics: 21(a)	Topics: 21(a)
7(f) All specifications, drawings, manuals, instructions, or procedures relating to any Other LPL Product.	Topics: 21(a)	Topics: 21(a)
7(g) The types and categories of documents that you receive, create, generate, or maintain concerning the development, manufacture, importation, purchase, distribution, sale, offer for sale, receipt, or advertisement of LPL Products.	Topics: 17	Topics: 17
8(a) The preparation and/or prosecution of each of the Asserted Patents and/or any Counterpart thereof;	Topics: 8(a)	Topics: 8(a)
8(b) Communications to, from, between and/or with any patent office or similar authority to which any of the invention(s) described, disclosed and/or claimed in	Topics: 8(b)	Topics: 8(b)

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the Asserted Patents or any Counterpart thereof were disclosed including without limitation the U.S. Patent and Trademark Office and/or any other person, attorney or agent, concerning in any way any of the Asserted Patents and/or any Counterpart thereof, including but not limited to all documents or information presented to the Examiner of the applications that issued as the Asserted Patents and/or any Counterpart thereof and all notes or reports relating to, reflecting or evidencing any interview and/or communication with any Examiner;		
8(c) The disclosure or nondisclosure of any Prior Art LPL Product to any patent office or similar authority during prosecution of each of the Asserted Patents and/or any Counterpart thereof, including without limitation any Information Disclosure Statements and/or PTO-1449 Forms submitted to the U.S. Patent and Trademark Office, and the circumstances as to how and when LPL and/or the inventors, or their attorneys and/or agents for each of the Asserted Patents and/or any Counterpart thereof became aware of any cited or disclosed references;	Topics: 8(c)	Topics: 8(c)
8(d) All facts and circumstances relating to the disclosure or nondisclosure to	Topics: 8(a)(b)(c)(d)	Topics: 8(a)(b)(c)(d)

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any patent office or similar authority during prosecution of each of the Asserted Patents and/or any Counterpart thereof, including without limitation any Information Disclosure Statements and/or PTO-1449 Forms submitted to the U.S. Patent and Trademark Office, of any Flat Panel Display Product, including without limitation any product that has a fastening part or element at its rear surface, made by LPL or known to LPL, and/or the inventors, or their attorneys and/or agents for each of the Asserted Patents and/or any Counterpart, that bears on the patentability of, or any arguments made to the patent office regarding the inventions disclosed in each of the Asserted Patents and/or any Counterpart thereof;		
8(e) All details regarding the awareness of any of the inventors of the Asserted Patents and/or any Counterpart thereof, the attorneys who prepared and/or prosecuted the applications that led to the Asserted Patents and/or any Counterpart thereof, and anybody substantively involved in the preparation and/or prosecution of the applications that led to the Asserted Patents and/or any Counterpart thereof of any Prior Art LPL Product;	Topics: 11	Topics: 11
8(f) Any policy or procedure of LPL for managing its duty	Topics: 8(a)(b)(c)(d)	Topics: 8(a)(b)(c)(d)

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of disclosure to the United States Patent and Trademark Office during or after the prosecution of patent applications.		
8(g) The statements contained in the Amendment filed on or about January 17, 2001 in the prosecution of the application that led to the '641 patent; including the factual information on which such statements were based.	Topics: 5(b)	Topics: 5(b)
8(h) The facts known to anyone involved in the prosecution of the applications for the Asserted Patents and/or any Counterpart thereof, including without limitation, LPL and/or the inventors, or their attorneys and/or agents, relating to the existence of and/or structure of Prior Art LPL Products, including without limitation the location of fastening parts or elements on the product used for any purpose, if at all.	Topics: 1(a); 8(a)(b)(c)(d); 28	Topics: 1(a); 8(a)(b)(c)(d); 28
8(i) Any facts or circumstances that support, evidence, contradict or negate the defense of inequitable conduct.	See topics corresponding to 8(h) above	See topics corresponding to 8(h) above